

EXHIBIT J

From: [Maxwell Pritt](#)
To: [Stameshkin, Liz](#); [David Simons](#); [Lauter, Judd](#); [Dunning, Angela L.](#); [Kathleen Hartnett](#); mlemley@lex-lumina.com; [Ghajar, Bobby A.](#); [Ghazarian, Colette A](#)
Cc: [Jesse Panuccio](#); [Poppell, Cole A](#); [Biksa, Liene](#); [Weinstein, Mark](#); [Alvarez, Jessica](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Margaux Poueymirou](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clobes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSF](#); [Josh Schiller](#); [David Boies](#); [z/Meta-Kadrey](#)
Subject: RE: Kadrey v. Meta - Depositions
Date: Thursday, October 17, 2024 1:54:32 PM

Counsel,

We presently intend to notice depositions of the following individuals. Please let us know the following witnesses' availability between 10/24 and 11/8, and confirm their locations: Angela Fan, Mike Clark, Joelle Pineau, Chaya Nayak, and Sergey Edunov. Please let us know the following witnesses' availability between 11/11 and 11/27, and confirm their locations: Guillaume Lample, Edouard Grave, Nikolay Bashlykov, Alex Boesenberg, Yann LeCunn, Amanda Kallet, Aurelien Rodriguez, and Hugo Touvron. We understand some of these individuals are former Meta employees so please let us now if you will be representing those individuals. Finally, please let us know the following witnesses' availability between 12/2 and 12/13: Logan Kerr, Chris Cox, Eugene Nho, Steven Roller, Sean Bell, Amrish Acharya, and Arun Rao. If any individuals are not available in the requested date ranges, please let us know their subsequent availability (or for those in the later date range, all of their availability before 12/13).

Also, we have asked repeatedly that Meta identify PMKs for our topics, including again on yesterday's M&C—please do so and provide their availability, or let us know by when you will provide that information, so that we can include it in the Tuesday report to Judge Hixson.

Thank you.

Best,
 Max

From: Maxwell Pritt
Sent: Tuesday, October 15, 2024 4:31 PM
To: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <DSimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>
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Thank you, Liz. We will endeavor to do so tomorrow. Please let us know tomorrow as well who you will be designating for each of the 30(b)(6) topics in the amended notice we served a week ago.

Best,
Max

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Tuesday, October 15, 2024 4:06 PM

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Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Depositions

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Counsel,

In view of the Court's order today, please provide us with the list of witnesses whose depositions Plaintiffs intend to take. We need these right away to investigate their availability and comply with Judge Hixson's instructions. We ask to receive this list by tomorrow.

In addition, please provide dates and locations for the depositions of Matthew Klam and Rachel Snyder. We reserve all rights with respect to Christopher Farnsworth pending the outcome of the consolidation decision.

Best,

Liz

Elizabeth L. Stameshkin

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Pronouns: she, her, hers

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